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proffers

1 message

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Thu, Apr 3, 2025 at 10:35 PM

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Cc: Sarah Schwietz <sarah@coburngreenbaum.com>, Marc Eisenstein <marc@coburngreenbaum.com>

Bcc: Barry Coburn <barry@coburngreenbaum.com>

Hello government, per my letter to the Court of a few hours ago, here is a start to our more detailed defense witness proffers. We will continue to enhance and refine them tomorrow and over the weekend, in accordance with my letter. By the end of the weekend, we will make a unitary, consolidated set of more detailed defense proffers available so that the government can evaluate them all together. We also will respond further to Dan's email of yesterday about these proffers. Best regards, Barry

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Wael Hana: Would testify about the reasons he hired Nadine as a consultant, the work she did for IS EG Halal while consulting, and why he did not terminate their consulting arrangement early. Additionally, he would testify about the mortgage loan he provided to Nadine and the gifts he gave her over the course of their friendship. He would also testify about the constituent services he sought and received from Robert Menendez.

Katia Tabourian: Would testify about the Defendant's family history with gold and jewelry, personality (including her attitude toward gift-giving and receiving), and her character and reputation for honesty and truthfulness, in addition to other relevant character traits. Testimony would include information about Nadine's sources of income following her first divorce, Nadine's luxury belongings, and gold and other luxury gifts received on various special occasions. Testimony would also include information about how Nadine and her family catalogued and listed their gifts and valuable belongings.

Jamela Maali: Would testify about her experience working with Fred Daibes, her knowledge of gift giving from Mr. Daibes to Nadine Menendez, his reputation for gift giving, and her knowledge of Mr. Daibes' interest in owning Ms. Menendez's home. She would further testify about Ms. Menendez's interest in looking to purchase a new home in early 2022.

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U.S. District Court

Southern District of New York

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Case Name: USA v. MENENDEZ

Case Number: 1:23-cr-00490-SHS

Filer: Dft No. 2 - Nadine Menendez

Document Number: 816

Docket Text:

LETTER by Nadine Menendez addressed to Judge Sidney H. Stein from Barry Coburn dated 04/03/2025 re: Defense Witness Proffers (Coburn, Barry)

1:23-cr-00490-SHS-2 Notice has been electronically mailed to:

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